

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST
LITIGATION (NO. II)**

Case No. 3:23-md-3071
MDL No. 3071

The Honorable Waverly D. Crenshaw

This Document Relates to: ALL CASES

**DECLARATION OF SAMUEL J. STRAUSS IN SUPPORT OF
SCOTT+SCOTT AND ROBINS KAPLAN LEADERSHIP APPLICATION**

I, Samuel J. Strauss, pursuant to 28 U.S.C. §1746, declare that the following is true and correct to the best of my knowledge and belief.

1. I am a member in good standing of the State Bars of Illinois, Washington, and Wisconsin.
2. I am a partner of the law firm of Turke & Strauss LLP, counsel for plaintiffs in *Boelens v. RealPage, Inc.*, No. 2:22-cv-01802 (W.D. Wash. Dec. 20, 2022), which is part of the above-captioned multidistrict litigation (the “MDL”).
3. Pursuant to this Court’s April 19, 2023 Order (Dkt. No. 3) and the June 1, 2023 Order (Dkt. No. 119), I submit this declaration in support of the Watters Plaintiffs’ Leadership Application submitted by Scott+Scott Attorneys at Law LLP and Robins Kaplan LLP (the “Scott & RK Leadership Application”).

1. I have substantial class action and complex litigation experience, particularly involving consumer privacy, product liability, and data security issues. Over the course of my career, the cases in which I have represented plaintiffs have resulted in the recovery of hundreds

of millions of dollars for consumers. I have a national practice and appear in federal courts across the country. Our firm regularly represent consumers in litigation against some of the largest and most well-resourced companies in the United States, including Wells Fargo Bank, N.A., LG Electronics U.S.A., Inc., The Clorox Company, Best Buy, Monsanto Company, General Motors, American Honda Motor Corporation, Stearns Lending, LLC, Fiat Chrysler Automobiles, Microsoft Corporation, and American Power & Gas.

4. I have been a litigator since 2013. During that time, either I or Turke & Strauss LLP have been appointed to leadership positions in many different complex cases. *See In re Netgain Technology, LLC Consumer Data Breach Litigation*, No. 21-cv-01210 (D. Minn.) (Interim Executive Committee); *Dusterhoff, et al. v. OneTouchPoint Corp.*, No. 2:22-cv-00882 (E.D. Wisc.) (Plaintiffs' Steering Committee); *In re Lincare Holdings Inc. Data Breach Litigation*, No. 8:22-cv-01472 (M.D. Fl.) (Interim Executive Leadership Committee); *Forslund v. R.R. Donnelley & Sons Company*, No. 1:22-cv-04260 (N.D. Ill.) (interim co-lead counsel); *Medina v. PracticeMax Incorporated*, No. 2:22-cv-0126 (D. Az.) (Executive Leadership Committee); *In re C.R. England, Inc. Data Breach Litig.*, No. 2:22-cv-00374 (interim co-lead counsel); *Doe, et al. v. Knox College, Inc.*, No. 4:23-cv-04012 (C.D. Ill.) (co-lead counsel); *In re OakBend Medical Center Data Breach Litigation*, No. 4:22-cv-03740 (S.D. Tex.) (interim co-lead counsel); and *Doe v. Highmark, Inc., et al.*, No. 2:23-cv-00250-NR (W.D. Penn.) (Interim Plaintiff's Executive Committee). Based on this experience and my understanding of the circumstances of this MDL, I support the Scott & RK Leadership Application.

5. I am familiar with the work of Scott + Scott Attorneys at Law LLP ("Scott+Scott") and Robins Kaplan LLP ("Robins"). For example, I had the pleasure of working with Scott + Scott and Robins Kaplan representing financial institutions in *In re Equifax, Inc. Customer Data*

Security Litigation, No. 1:17-md-2800-TWT. Both firms litigated the case with the utmost professionalism, dedication, and efficiency. Likewise, I had the good fortune of working with Robins on a series of other complex cases, including *Fowler, et al. v. Wells Fargo Bank, N.A.*, No. 4:17-cv-02092-HSG (N.D. Cal.). Robins effectively managed these complex cases by creating an efficient model for internal communication and distribution of work. It is a pleasure working with firms like Robins and Scott+Scott, as they share our commitment to creating a dynamic and diverse legal landscape by ensuring non-traditional and early career professionals have meaningful opportunities to participate in the litigation. Both firms are eminently qualified to lead the Multifamily Plaintiffs in this MDL and I support the appointment of these two firms as interim co-lead counsel, as set forth in the Scott & RK Leadership Application.

6. Turke & Strauss LLP is available and willing to assist the Watters Plaintiffs Leadership team should they ask for our assistance in prosecuting this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2023

Chicago, Illinois

/s/ Samuel J. Strauss

Samuel J. Strauss
TURKE & STRAUSS LLP
Pro Hac Vice Pending
613 Williamson St., Suite 201
Madison, WI 53703
Tel: 608-237-1775
Email: sam@turkestrauss.com